IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

CURL	\mathbf{v}	VA	TINI	7
CUNL	/ I	ΙV	UIN	э,

Plaintiff,

CIVIL ACTION NO.: 1:06-CV-563

VS.

HONEYWELL TECHNOLOGY SOLUTIONS, INC.,

Defendant.

<u>DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION</u> <u>OF THIRTY DAYS TO FILE ANSWER</u>

COMES NOW, Defendant Honeywell Technology Solutions Inc. ("Honeywell") and moves this Court for an additional 30 days or until August 17, 2006, in which to file its Answer. Honeywell makes this Motion based on the following:

- 1. The Complaint was served on June 28, 2006, and the Answer is currently due to be filed by July 18, 2006.
- 2. The parties are currently discussing the merits of the allegations and possible alternatives to litigation.
- 3. The grant of thirty additional days to file an Answer, or until August 17, 2006, will give the parties sufficient time to explore possible alternatives to litigation.
 - 4. Plaintiff does not oppose this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests that this

Honorable Court GRANT this Motion.

/s/ Sandra B. Reiss

SANDRA B. REISS (asb-3650-s80s)
OGLETREE, DEAKINS, NASH
SMOAK & STEWART, P.C.
One Federal Place, Suite 1000
1819 Fifth Avenue North
Birmingham, Alabama 35203-2118
(205) 328-1900
(205) 328-6000 Fax

E-mail: Sandra.Reiss@odnss.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2006, I electronically filed the foregoing *Defendant's* Unopposed Motion for An Extension of Thirty Days to File Answer, with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following: Jeffrey W. Bennitt.

/s/ Sandra B. Reiss

SANDRA B. REISS (asb-3650-s80s) OGLETREE, DEAKINS, NASH SMOAK & STEWART, P.C. One Federal Place, Suite 1000 1819 Fifth Avenue North Birmingham, Alabama 35203-2118 (205) 328-1900 (205) 328-6000 Fax

E-mail: Sandra.Reiss@odnss.com